

REMARKS

Claims 1-36 are currently pending in the patent application. The Examiner has rejected Claims 1-36 under 35 USC 103 as unpatentable over Rowney in view of Sudia. For the reasons set forth below, Applicants respectfully assert that all of the pending claims are patentable over the cited prior art.

The present invention is directed to an enterprise-based system for processing transactions wherein a transaction management system automatically creates an electronic transaction comprising an electronic representation of the transaction and a plurality of verifiable anonymous role certificates which must be completed. The electronic transaction includes at least one verifiable anonymous role certificate to be completed for each of the plurality of roles for which approval is required to obtain authorization of the transaction. In creating the electronic transaction, a database may be consulted to obtain a permission set of potential recipients who are in the roles to authorize the transaction. Once created, the electronic transaction is routed to obtain the relevant approvals which comprise completed role

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certificates, followed by verifying the authenticity of the completed role certificates against stored role certificates with corresponding signatures.

The claims expressly recite that "role certificates" are included in the electronic authorization of the transaction, since approvals have to be obtained for each of a plurality of roles but not for each of a plurality of individuals. Applicants reiterate the earlier contention, not expressly addressed by the Examiner, that the term "role certificate" is a specific term which was defined in the Specification from the bottom of page 8 to the bottom of page 10. The defined and claimed "role certificate" is a certificate which represents the role, and not the person, from which approval must be obtained for authorization of the transaction.

Applicants further reiterate that the role certificates of the present invention are anonymous (see: page 9, lines 1-page 10, line 1), so that authorization is associated with a role and not a person, and are generated in a format requiring completion. What is generated in the present invention is an electronic authorization "form" of a transaction including the electronic representation of the transaction and the plurality of anonymous role certificates

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to be completed. The present claims do not recite a system and method for generating a completed authorization by an authorizing body. Rather, they recite a system and method for generating and distributing an electronic authorization which must be completed, and then verified. The amended language of the independent claims expressly recites that the role certificates which are part of the electronic representation of the transaction are anonymous, that the role certificates require completion, and that a plurality of the anonymous role certificates are associated with a transaction, at least one for each needed approval.

The Rowney patent teaches a three-step approval system wherein a first computer (the customer computer) submits a name and value pair to an administrative function located on a third computer (the merchant computer); the third computer sends the name and value pair along with identifying certification information to a certification authority on a second computer (a payment gateway); and, the second computer creates a certificate comprising the name and value pair and other certification information. The created certificate is used for authenticating the identity of the customer using the first computer as a party that can pay the stated value. The certificate is a completed

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authentication which is user-specific. The Rowney user-specific certificate is not anonymous. The entity which is generating the user-specific certificate is the authenticating entity.

Applicants respectfully reiterate that the Rowney patent provides no teachings of verifiable anonymous role certificates which require completion being included in any of the communications which are passed among the three computers, as acknowledged by the Examiner. The Rowney communications may include "certification information" and may result in a "certificate" being rendered by the payment gateway for identifying the customer, but there are no teachings or suggestions of an automatically generated electronic transaction comprising an electronic representation of the transaction and at least one verifiable role certificate to be completed for each role for which approval is required to obtain authorization of the transaction. Applicants again assert that Rowney does not teach or suggest creating an electronic authorization of a transaction including an electronic representation of the transaction; does not teach or suggest role certificates, but teaches user-specific authorizations; does not teach or suggest anonymous certificates, but includes name-value

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pairs which are user-specific; and, does not teach or suggest that certificates are generated *for authentication completion*, but are complete user-specific certificates generated by the authenticating entity.

The Examiner has acknowledged that the Rowley patent does not teach an electronic representation of a transaction and further that Rowley does not teach or suggest at least one verifiable anonymous role certificate for each role for which approval is required to be completed to obtain authorization of the transaction and certificates generated for authentication completion. The Examiner has cited the Sudia patent publication as providing those teachings which are missing from the Rowley patent.

The Sudia patent publication was published on March 7, 2002, based on a patent application which was filed on June 1, 2001. Applicants respectfully assert that the Sudia patent publication is not available as a reference against the present application. The present application was filed in the United States Patent Office on January 5, 2001, based on a priority application which was filed on January 7, 2000. Since the present patent application was filed in the United States prior to the effective date of the Sudia patent publication, the Sudia patent publication is not

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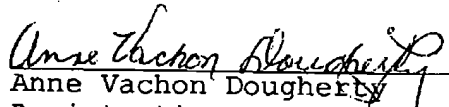
available as a reference against the present claims under either 35 USC 102 or 35 USC 103.

In light of the fact that the Rowney patent does not teach or suggest the invention as claimed, and further in view of the fact that the Sudia patent publication is not available as a reference against the present claims, Applicants respectfully request reconsideration of the amended claim language in light of the remarks, withdrawal of the rejections based on Rowney, and allowance of the claims.

Respectfully submitted,

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